

HEARING DATE: April 23, 2019
TIME: 10:00 a.m.

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By: Justin W. Gray, Esq.

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:

NEW ENGLAND MOTOR FREIGHT, INC.,
et al.¹,

Debtor.

NOTICE OF MOTION

Chapter 11

Case No.: 19-12809-JKS

PLEASE TAKE NOTICE that upon the annexed declaration of Justin W. Gray, Esq.; declaration of creditor Daniel Rinaldi; and the accompanying Memorandum of Law; the undersigned will move this Court before the Honorable John K. Sherwood, United States Bankruptcy Judge, at United States Bankruptcy Court, District of New Jersey, 50 Walnut Street, 3rd Floor, Courtroom 3D, Newark, New Jersey 07102 (the "Bankruptcy Court") on April 23, 2019 at 10:00 am., or as soon thereafter as counsel may be heard (the "Hearing"), for an Order for Relief from the Automatic Stay to enable Mr. Rinaldi to continue his New York State Supreme Court personal injury action against

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

debtor, Eastern Freight Ways, Inc., and for such other and further relief as the Court deems just an equitable.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion, shall be made in writing, filed with the Clerk of the Bankruptcy Court, and served upon counsel for the Movant so as to be received at least seven (7) days prior to the hearing date.

Dated: April 2, 2019

**MAYNARD, O'CONNOR, SMITH &
CATALINOTTO, LLP**

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